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TO THE COURT AND ALL PARTIES OF RECORD:

Pursuant to Civil L.R. 7.1-1, the undersigned counsel of record for defendants 4 Layne Christensen Company Health and Welfare Plan and Construction Industry Laborers Welfare Fund, certifies that the following listed party (or parties) may have a pecuniary interest in the outcome of this case. This representation is made to enable the Court to evaluate possible disqualification or recusal.

<u>Party</u>	Connection/Interest
1. Layne Christensen Company Health and Welfare Plan	Named Defendant
2. Layne Christensen Company	Sponsor of Layne Christensen Company Health and Welfare Plan
3. Construction Industry Laborers Welfare Fund	Named Defendant

DATED: January 25, 2016

REED SMITH LLP

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